

Applicant(s): Olivier Guaume, et al.
Serial No.: 10/028,099
Filed: December 21, 2001
For: METHOD FOR OPTIMIZATION OF TEMPERAL PERFORMANCES WITH RAPID CONVERGENCE
Art Unit: 2825
Examiner: Thompson, Annette M.

FR000157

REMARKS/ARGUMENTS

Claims 1 through 6 are pending in the present application.
Claims 1 to 6 have been amended.

The Office Action (1) rejected claims 1 and 2 under 35 U.S.C. 112, first paragraph as failing to comply with the enablement requirement thereof, (2) rejected claims 1, 4 and 5 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,516,456 to Garnett et al. (hereinafter "the Garnett reference"), (3) rejected claim 6 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 6,091,963 to Mannerstrale et al. (hereinafter "the Mannerstrale reference"), and (4) objected to the drawings, and more particularly Fig. 4 of the drawings for failing to comply with 37 CFR 1.84(p)(5).

Regarding item (1) identified above, it is respectfully submitted that present claims 2 and 3 effectively traverse the stated enablement rejection and that the changes made thereto are fully supported by the original disclosure with no new matter being added.

With regard to the contention that the reference symbols (e.g., "i", "j", "k", "i+j", etc.) used in the specification to generically distinguish cells provide insufficient clarification as to Applicant's intended meaning, it is respectfully submitted that the specification need only "teach those skilled in the art how to make and use the full scope of the claimed invention without 'undue experimentation'". In re Wright, 999 F.2d 1557, 1561, 27 U.S.P.Q.2d 1510, 1513 (Fed. Cir. 1993). How a teaching is set forth, by specific example and/or broad terminology, is not important. In re

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Marzocchi, 439 F.2d 220, 223-24, 169 U.S.P.Q. 367, 370 (C.C.P.A. 1971). The only relevant concern should be whether the disclosure is commensurate with the scope of protection sought by the claims. In re Moore, 439 F.2d 1232, 1236, 169 U.S.P.Q. 236, 239 (C.C.P.A. 1971).

Accordingly, as the reference terminology/symbols used are sufficient to generically distinguish, classify and/or describe cells in relation to other cells, it is respectfully submitted that the specification is commensurate with the scope of protection sought by the claims. Hence, reconsideration and withdrawal of the rejection, and allowance of claims 2 and 3, are respectfully requested.

Regarding item (2) identified above, it is respectfully submitted that claim 1 is patentable over the Garnett reference and that the Garnett reference fails to disclose or suggest "a library having several categories of cells, the cells of a same category all having the same functionality" and/or "identification of cells which have a computed propagation time value greater than a predetermined reference value." (emphasis added).

The Action contends that "[t]o mitigate any timing violations that may exist, a first drive strength adjust tool 178 may be provided to identify selected components along selected timing paths to substitute with a corresponding logically equivalent component having a different drive strength" (col. 12, lines 46-50), reads on "a library having several categories of cells, the cells of a same category all having the same functionality". It is respectfully submitted that "selected components along selected timing paths" is not the same as "a library having several categories of cells" and "a

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corresponding logically equivalent [substitute] component" is not the same as "cells of a same category having the same functionality".

The Action further suggests that a timing analysis tool that may "report all timing paths that have an overall path delay that falls outside of a predetermined timing specification" reads on "identification of cells which have a computed propagation time value greater than a predetermined reference value". It is respectfully submitted that "falling outside a predetermined timing specification" is not the same as being "greater than a predetermined reference value".

Accordingly, based at least on the foregoing discussion, reconsideration and withdrawal of the rejection, and allowance of claim 1, are respectfully requested.

Regarding item (3) identified above, it is respectfully submitted that present claim 6, which indirectly depends from claim 1, is patentable over the Mannerstrale reference and effectively traverses the stated rejection. Accordingly, reconsideration and withdrawal of the rejection, and allowance of claim 6, are respectfully submitted.

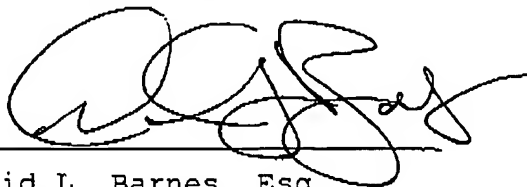
Regarding item (4) identified above, it is respectfully submitted that revised Fig. 4 (redlined copy attached hereto) effectively traverses the stated objection to the drawings. Accordingly, reconsideration and withdrawal of the objection to the drawings are respectfully requested.

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In sum, it is respectfully submitted that the present claims are patentable over each of the cited references. Hence, this application is in condition for allowance. Accordingly, reconsideration and withdrawal of all rejections, and all objections of the claims, are respectfully requested.

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